

Black Country Core Strategy  
Issues and Options Report  
Representations on behalf of IM Land

August 2017

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**Contact**

Tom Armfield  
Tom.armfield@turley.co.uk

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# 1. Introduction

- 1.1 These representations are made on behalf of IM Land (hereafter referred to as 'IM'), who are promoting land at Queslett Road/ Aldridge Road, Walsall (hereafter referred to as 'the site' or 'Columba Park').
- 1.2 IM is one of the UK's leading land promoters and is committed to investing and delivering development in the Midlands. In Walsall, IM's vision is to create a community that responds to the local and regional need for high-quality homes and community facilities. IM work collaboratively with local authorities, developers and land owners to ensure that the places that are being brought forward are deliverable and create a positive legacy for future generations.
- 1.3 The site is located within the administrative area of Walsall Council which forms one of the four authorities (along with Dudley, Sandwell and Wolverhampton) whom make up the Black Country Core Strategy ('BCCS') Plan area. The BCCS was adopted in February 2011 and covered the period 2006 to 2026. The BCCS is now being reviewed to ensure its spatial objectives and strategy are being effectively delivered, and it remains up to date. Coupled with this are the Black Country's ambitions for significant employment and residential growth.
- 1.4 IM welcome the opportunity to provide comments on the BCCS Review Issues and Options Report (the 'I&O Report'). These representations are supported by the following:
  - Site Location Plan (**Appendix 1**)
  - Call for Sites Form (**Appendix 2**)
  - Vision Document for Columba Park (**Appendix 3**)

## 2. Response to Questions

### **Q1. Do you agree that the Core Strategy review should be a partial review, retaining and stretching the existing spatial strategy and updating existing policies? If not, what do you think should be the scope of the review?**

- 2.1 Paragraph 151 of the National Planning Policy Framework ('NPPF') establishes that Local Plans should be consistent with the principles and policies set out in the NPPF. The adopted BCCS was published in 2011, prior to the publication of the NPPF in March 2012. It is based on the housing needs identified by the now revoked West Midlands Regional Spatial Strategy ('WMRSS') and the subsequent WMRSS Phase II Review Panel Report. The Solihull MBC v Gallagher Homes Limited and Lioncourt Homes Limited Judgment [2014] EWHC 1283 (Admin) was clear that the NPPF affected radical change.
- 2.2 The Housing White Paper (published in February 2017) establishes a national need for a minimum of between **225,000 to 275,000 new homes per year** to keep up with population growth and to start addressing decades of under-supply in housing delivery.
- 2.3 The West Midlands Combined Authority Strategic Economic Plan ('WMCA SEP') (June 2016) recognises the importance of planning to meet these ambitious levels of growth. Indeed housing is one of the Plan's eight priority actions. Clearly the BCCS Review needs to provide a robust strategy to meet the significant growth across the Black Country, reflecting the priority actions set out in the WMCA SEP.
- 2.4 The adopted BCCS did not release any Green Belt land for development. In stark contrast, the emerging BCCS proposes the release of Green Belt land to deliver a minimum of 14,270 dwellings in order to meet the Black Country's needs. This represents a significant departure from the approach of the adopted BCCS.
- 2.5 To date the BCCS has failed to meet the Black Country's needs since 2006. As at 31 March 2016 there is a shortfall of 3039 dwellings against the stepped housing delivery trajectory. There is a shortfall of 57 ha of employment land. There is a shortfall of 191,756 sqm of office floor space in strategic locations.
- 2.6 Therefore a full review of the BCCS is essential to ensure:
- The plan is up to date and is prepared in the current planning context, and reflects the area's current needs (as opposed to those identified in the now revoked WMRSS).
  - All policies and objectives of the emerging BCCS Review are consistent with national planning policy.
  - It comprises a strategy which will deliver against the Black Country's identified needs, and one that is effective, and measurably so, when compared to the shortcoming of the adopted BCCS.
- 2.7 We discuss the need for a full review further in response to Q7, Q9 and Q21.



**Q2. Do you think that the key evidence set out at Table 1 is sufficient to support the key stages of the Core Strategy review? If not, what further evidence is required and, if there are any particular issues that should be taken into account in considering development on any particular sites or in any particular areas?**

- 2.8 The evidence base currently comprises employment studies that assess strategic sites, high quality employment land and regional logistics sites. Additional employment evidence is necessary to assess the entire supply of employment land across the Black Country, including the value, demand and characteristics of the existing supply. This will be crucial to informing whether it is feasible to release employment land to deliver approx. 10,400 new homes (Strategic Option 1B which is discussed further at Q11a).
- 2.9 If any existing sites are to be proposed for allocation as residential development the evidence base should demonstrate the suitability of the land. This includes consideration of contamination issues, whether the land is a suitably attractive location for residential development, and whether existing neighbouring uses would provide an issue for future residents.
- 2.10 A number of infrastructure studies (including flood risk / water, waste, and viability) are to be undertaken to inform the BCCS Review Preferred Options Paper. Infrastructure viability will be a key factor in determining the deliverability of sites to meet the area's housing and employment needs. To provide a robust assessment of infrastructure public consultation should be undertaken. This will ensure that a full picture regarding infrastructure viability is provided, as residents / landowners will have information which the Black Country authorities' assessment work may not be aware of.
- 2.11 These studies should also not just assess infrastructure within the Black Country exclusively, but also the infrastructure required outside of the area which may be required to meet its needs. For instance, some residents from within the Black Country attend schools in other authority areas, such as Birmingham and the South Staffordshire. Cross boundary working with other authorities will be crucial in this respect.

**Q3. Do you agree that the housing need identified for the Black Country over the period 2014-36 in the SHMA, and the anticipated amount of supply, are appropriate and in line with national guidance?**

- 2.12 The consultation on a standardised approach to the calculation of OAN is scheduled for September 2017 and, according to correspondence from DCLG (dated 31st July 2017), any Plans which have not been submitted by March 2018 (as will be the case for the BCCS Review) will be required to apply the new standardised methodology.
- 2.13 In terms of the SHMA, the Objectively Assessed Housing Need ('OAHN') is derived from the 2014 Sub National Household Projections which PPG confirms represents the starting point for calculating need.
- 2.14 We reserve the right to comment further on the OAHN once the standardised methodology has been published, and used to calculate the Black Country's needs.

**Q5. Do you agree with the proposed approach to the Black Country Green Belt Review? If not, what additional work do you think is necessary?**

- 2.15 We discuss the strategy to meeting housing and employment needs in the Green Belt in response to Q12a and Q13a.
- 2.16 The Green Belt Review should be a robust assessment, undertaken in accordance with national planning practice guidance and the NPPF, specifically taking account of the need to promote sustainable patterns of development and not including land which it is unnecessary to be kept permanently open.
- 2.17 As part of this the methodology for the Review should be published for consultation prior to work commencing. This will be important to ensure the Review is robust and has the support of the development industry.
- 2.18 The I&O Report indicates the GBHMA Strategic Growth Study (renamed the 'Strategic Locations Study') will "inform and provide the basis" for the Black Country Green Belt Review.
- 2.19 The methodology for the Strategic Locations Study, made available in July 2017, is very broad; referring to the Green Belt will be assessed in 'five sections'. If the study is too broad, and the strategic areas identified too general, it will not form a sound basis for the Black Country Green Belt Review to conclude which land is suitable for Green Belt release. There may be opportunities within discounted areas for smaller parcels of land to be released as sustainable extensions to existing settlements.

**Q6. Do you agree that the key issues set out in Part 3 are the key issues that need to be taken into account through the Core Strategy Review? If not, what other key issues should be taken into account?**

- 2.20 The nine key issues identified at Part 3 of the I&O Report represent the matters which will be integral to the BCCS Review achieving its ambitious plans for growth.
- 2.21 Mindful of the ambitious levels of growth proposed for the Black Country, the three key issues relating to housing and employment needs, and reviewing the Green Belt, are the most important to take account through the BCCS Review.
- 2.22 The need to review the role and extent of the Green Belt in order to meet the housing and employment needs of the area should be seen as a golden thread throughout the BCCS Review, reflecting issues specific to the Black Country. The key to unlocking this significant level of growth will be providing sufficient infrastructure (including highways, education etc).

**Q7. Do you think that the Core Strategy vision and sustainability principles remain appropriate? If not, what alternatives would you suggest?**

- 2.23 In Q1 we make the case for a full review of the BCCS. This would also necessitate a review of the vision and sustainability principles underpinning the Plan. This is particularly relevant as to date the current vision has not delivered the necessary housing and employment growth required by the BCCS.

- 2.24 The adopted BCCS vision and sustainability principles reflect the area's need at that time (i.e. February 2011). Since then the NPPF has been published and the WMRSS revoked. A new vision is therefore necessary to reflect the area's needs now, which are much higher than at the time the BCCS was adopted, which is demonstrated by the admission that Green Belt land will be necessary. In contrast no Green Belt was released by the adopted BCCS (indeed the boundaries have not been altered for over 30 years).
- 2.25 Furthermore, the adopted BCCS' vision is underpinned by three 'major directions of change', none of which specifically refer to meeting the Black Country's housing needs. The BCCS Review vision would be more robust if it was underpinned by the nine key issues set out at Part 3 of the I&O Report.

**Q8. Do you think that the Core Strategy spatial objectives remain appropriate? If not, what alternatives would you suggest and how might these changes impact on individual Core Strategy policies?**

- 2.26 Similarly to the BCCS' vision and sustainability principles, the spatial objectives must be reviewed to ensure they are up to date. The BCCS Review will be produced in a completely different planning context to that of the adopted BCCS. In particular the existing objectives will not form a sound basis to deliver the anticipated levels of growth of the Black Country, let alone the current levels proposed by the BCCS.
- 2.27 Meeting the emerging housing and employment needs will underpin the BCCS Review. It is therefore imperative they these needs are reflected in the objectives, which will be used to measure the success of the Plan. The objectives must also be more robust than those of the current BCCS if they are to be meaningful.

**Q9. Do you agree that Policies CSP1 and CSP2 should be retained and updated to reflect new evidence and growth proposals outside the Growth Network? If not, what changes do you think should be made to Policies CSP1 and CSP2 in response to new challenges and opportunities?**

- 2.28 We set out in response to Q1 that a full review of the BCCS is necessary given the change in the planning policy, namely the publication of the NPPF and the revocation of the WMRSS. Policies CSP1 and CSP2 therefore need to be reviewed and updated as appropriate. This is particularly relevant given neither policy reflects that a proportion of the Black Country's growth needs cannot be met within the urban area (which is explicitly acknowledged at paragraph 3.17 of the I&O Report), necessitating the release of land from the Green Belt.

**Q11a. Do you support Strategic Option 1A? If yes, please explain why. If no, do you support Option 1B?**

- 2.29 Please refer to response to Question 11b.

**Q11b. Do you support the release of further employment land for housing? If yes, what should the characteristics of these areas be?**

- 2.30 At the current time there is an established requirement for the Black Country Authorities to accommodate 81,190 new homes and up to 300 ha of new employment land between 2014 and 2036. It is clear that both are pressing needs which will require significant land.

- 2.31 There is currently a deficit of 57 ha of gross employment space across the Black Country. The monitoring data at Appendix C of the I&O Report identifies that there is a surplus in local quality employment land (146 ha), but a deficit of 218 ha in high quality employment land. This does not distinguish between different types of employment, including different use classes, size etc.
- 2.32 The Black Country's employment land is characterised by its supply of smaller industrial units which are typically adjacent to residential areas. Whilst some of the businesses may not be 'friendly' to neighbouring uses, these types of units form the back bone of the Black Country economy and their loss would negatively impact business in the area. The loss would also remove local, sustainable job opportunities.
- 2.33 As set out in our response to Q2 further employment land supply evidence is required. Through this there may be opportunities to replace derelict employment land with housing, however new employment sites tend to be of higher quality, reflecting more modern industries (such as large logistic sites). They are unlikely to replace the smaller industrial unit stock, which have numerous benefits including lower rents, being suited for 'start up' and smaller businesses which reflect of the Black Country's employment profile. New large, greenfield strategic employment sites are unlikely to be affordable for the types of businesses which currently occupy the smaller industrial unit stock.
- 2.34 With the Black Country facing an overall employment land deficit of 300 ha, the authorities should be seeking to protect the smaller industrial stock where possible and not maximising it for residential uses.
- 2.35 The Councils should also be mindful of the viability of regenerating employment land for residential use, and whether the market could sustain development on these sites. This is demonstrated by the number of previously developed sites in the Black Country allocated for housing but are yet to be delivered, and show no sign of doing so in the near future.

**Q12a. Do you support Spatial Option H1? What criteria should be used to select suitable sites? E.g. ability to create a defensible new Green Belt boundary, size, access to existing residential services.**

- 2.36 Please refer to response to Question 13a.

**Q13a. Do you support Spatial Option H2? What should the characteristics of Sustainable Urban Areas (SUEs) be? E.g. minimum/ maximum size, mix of uses, mix of housing types, accessibility to other areas. What criteria should be used to select suitable sites? E.g. proximity to a rail station, availability of existing infrastructure, easy access to jobs, potential to support existing settlements/ services, proximity to the existing growth network, potential to support urban regeneration.**

- 2.37 Whilst there is no definition to the housing numbers associated with 'rounding off', this has been taken as any development site consisting less than 500 dwellings (the minimum threshold defined for SUEs).
- 2.38 The NPPF and PPG do not refer to 'rounding off' the Green Belt. The NPPF states at paragraph 85 that the boundaries of the Green Belt should be defined clearly, using physical features that are readily recognisable and likely to be permanent. These

boundaries should be long term and enduring, and will not require adjustment at the end of the plan period.

- 2.39 Subject to meeting the NPPF and PPG, rounding off of the edges of the urban area within the Green Belt could assist in meeting some of the Black Country's identified housing needs, however the I&O Report acknowledges that Option H1 would not meet all the area's outstanding housing growth.
- 2.40 Larger SUE sites will provide significant contributions towards delivering improved infrastructure given their critical mass. Relying too heavily on smaller sites through rounding off, would compromise the Black Country's ability to deliver new infrastructure to meet its growth aspirations.
- 2.41 Furthermore, a number of SUEs will be required if the Black Country's housing shortfall, which cannot be accommodated within the existing urban area (between 14,270 and 24,670 dwellings), is to be met.
- 2.42 Turley is a member of the Home Builders Federation and regularly advises national and local house builders. It is unlikely there will be significant market interest in sites of less than 50-100 dwellings. House builders require certainty in their own supply. A site of less than 50-100 dwellings would provide one or two years supply maximum, where as an SUE site would between three and five years supply, depending on the size of the site.
- 2.43 Furthermore the costs associated with installing infrastructure for a site, including constructing the site access, connecting to the appropriate utility grids, establishing a compound, are broadly similar for small and larger scale development. As such smaller sites are less cost effective for house builders. This could significantly compromise the potential delivery of the Black Country's housing needs.
- 2.44 In contrast SUEs are likely to have greater market interest. Large scale planned development, which is allocated within a Local Plan, provides certainty and developer confidence, as recognised by paragraph 52 of the NPPF. Therefore the sites are more likely to deliver, and can accommodate multiple housebuilders and outlets, increasing the rate of delivery once the required infrastructure has been installed.
- 2.45 Spatial Option H2 is therefore the most appropriate strategy for accommodating the area's housing shortfall, however Spatial Option H1 can make a small contribution in the right locations.
- 2.46 Any site selection criteria should reflect the NPPF, recognising that planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or **can be made** sustainable. Whilst a potential SUE may not be immediately adjacent to local services or a rail station (which will be the case for the majority of the SUEs given their location on the edge of the urban area), there is the potential to make it more sustainable through new transport links (such as bus services) and on site provision.
- 2.47 Given the critical mass of SUEs, they have the potential to sustain significant on site services. An example is IM's proposals for 1,000 new homes at Gaydon Lighthorne in

Stratford on Avon, which benefits from a resolution to grant. This will be capable of sustaining on site leisure and retail facilities and all associated infrastructure.

- 2.48 The BCCS Review should also not make assumptions that SUEs will have major impacts on Green Belt purposes and environmental assets (as suggested in the 'challenges' section for Spatial Option H2). Firstly, any site's performance against the Green Belt purposes is separate to any site selection process. The Green Belt Review is a separate exercise to determining the sustainability of a site. Secondly, SUEs in the Green Belt can have many environmental benefits, including delivering significant public open space (it is widely recognised the Black Country Green Belt is largely inaccessible), as well as biodiversity enhancements.

**Q13b. What infrastructure do you think would be needed for different sizes of SUEs?**

- 2.49 For the reasons provided in response to Q12a and Q13a, further evidence will be necessary to inform infrastructure requirements for each SUE, including school and healthcare provision. The I&O Report indicates a number of infrastructure assessments are to be undertaken before the Preferred Options version of the BCCS Review is published.
- 2.50 Furthermore, the Councils should be mindful of site specific evidence bases prepared by developers. Indeed IM is exploring infrastructure requirements for Columba Park and intends to submit this assessment work in due course.
- 2.51 The Black Country authorities should also liaise with the relevant statutory undertakers (such as Severn Trent, Western Power Distribution etc) to ensure the BCCS Review includes a robust Infrastructure Delivery Plan.

**Q13c. Are there any potential locations that should be considered for SUEs (please submit through the 'call for sites' form) and what infrastructure would be required to support these?**

- 2.52 Columba Park represents a unique opportunity to create a new community, which could provide approximately 1,500 new homes. IM's aspirations are to create a new neighbourhood which delivers real health and wellbeing, and economic benefits for both existing and new residents. This includes significant high quality open space, parkland and green infrastructure, well designed homes, and new community facilities.
- 2.53 IM is a market leader in the delivery of strategic housing and employment sites. Working in partnership with Bath and North East Somerset Council, IM is delivering a new community at MoD Ensleigh which includes a new 210-place primary school. IM is also working successfully alongside Solihull Council to deliver the mixed use business and residential campus at Blythe Valley, is delivering 750 dwellings, 250 bed extra care and 1m sq ft of commercial space. This represents the largest allocation in Solihull's Local Plan. As set out previously IM is also promoting land at Gaydon Heath for 1,000 dwellings and new retail and leisure facilities, which benefits from a resolution to grant.
- 2.54 We explore the infrastructure requirements of the site further in the Call for Sites form (**Appendix 2**) and Vision Document (**Appendix 3**) enclosed with these representations.



- 2.55 Given the site's location within the Green Belt we provide an assessment against the five purposes for including land within the Green belt below.

***Purpose 1 – To check the unrestricted sprawl of the large built-up areas***

- 2.56 The site is bound by residential development to the east, south and west. As such the site is enclosed by existing built form along three boundaries. At present the Green Belt boundary projects into the urban form of Walsall, utilising Aldridge Road, Queslett Road and Doe Bank Lane as the defensible boundaries.
- 2.57 The release of the site would not result in any unrestricted sprawl of the built up area and on the contrary it would actually contain development within an existing urban form.
- 2.58 Consequently, the enclosed nature of the site results in the land making a low contribution to the Green Belt in relation to checking the unrestricted sprawl of Walsall. It is anticipated that once the site is released from the Green Belt, the newly formed boundary will better correspond with the urban form of the surrounding area and present a logical Green Belt boundary to protect against any unrestricted sprawl of the future built-up area.

***Purpose 2 – To prevent neighbouring towns merging into one another***

- 2.59 An important requirement of the Green Belt is to prevent neighbouring towns from merging however paragraph 85 of the NPPF sets out that there may be opportunities for land to be released from the Green Belt that would assist in creating longer term permanent defensible boundaries.
- 2.60 The site currently presents a gap in the urban form of Walsall and residential development is located in the immediate vicinity to the east, south and west of the site. As illustrated on Walsall's policies map, the existing Green Belt boundary protrudes to the south east (to include the site) utilising Queslett Road East as a defensible boundary (the A4041). To release this site from the Green Belt would not result in any neighbouring towns merging into one another and the new defensible boundary would be formed by the northern edge of development, adjacent to the proposed parkland.

***Purpose 3 – To assist in safeguarding the countryside from encroachment***

- 2.61 Paragraph 84 of the NPPF states that when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. As such, development should be focussed towards urban areas inside the Green Belt boundary, towards towns and villages.
- 2.62 The site adjoins the urban area of Walsall and a masterplan is currently being prepared for the site that respects the surrounding countryside to the north west of the site. The early stage of masterplanning demonstrates how a landscaped view corridor can be included within the proposals and in particular how the existing landscape, including woodland, and ecological assets such as hedgerows and wildlife, can play a key role in the design of the community.
- 2.63 In accordance with the guidance set out in the NPPF, the site is located towards the urban area of Walsall and the release of this site from the Green Belt would not result in a detrimental encroachment into the countryside, as illustrated within the early stages of masterplanning for the site.

***Purpose 4 – To preserve the setting and special character of historic towns***

- 2.64 The site is not located within close proximity to any historical town. In historic landscape character terms, the site is located within the Barr Beacon/ Eldridge Fields area (reference WL09) which comprises a large geographical area and simply characterises this area as dispersed farms and recreation, enclosed field systems, with historic heath at Barr Beacon.
- 2.65 As discussed in response to Purpose 3, the early stages of masterplanning have demonstrated how important landscaping is for the proposed development site and in particular the proposals will comprise a large landscape buffer, protecting the setting for Barr Beacon. Furthermore, the site is not located within the setting to a historic town and as such this purpose is not considered to apply in this circumstance.

***Purpose 5 – To assist in urban regeneration, by encouraging the recycling of derelict and other urban land***

- 2.66 The BCCS Issues and Options Report sets out that there is a requirement for the Black Country Authorities to accommodate approximately 22-25,000 new homes and up to 300 ha of new employment land. It has been established that the Black Country has severely limited opportunities to accommodate this anticipated growth within the present urban boundaries and it is therefore necessary to consider Green Belt release.

**Q13d. Do you think that the Core Strategy should set out detailed guidance for the development of SUEs (e.g. type and tenure of housing, specific infrastructure required), rather than details being determined at a local level in light of local policies?**

- 2.67 Any guidance for SUEs should not be considered until later in the preparation of the Plan, and should be informed by the relevant evidence base (including site specific evidence, the SHMA, and infrastructure assessments). Any guidance should be flexible to ensure the Plan is able to respond to the most up to date evidence.

**Q15a. If all housing need cannot be met within the Black Country, do you support the 'export' of housing growth to neighbouring authorities within the HMA? What factors should be taken into account in an assessment of the opportunities in neighbouring authorities e.g. proximity to the edge of the urban area, proximity to a rail station, availability of existing infrastructure, easy access to jobs?**

- 2.68 The NPPG is clear that local planning authorities should have fully explored all available options for delivering their housing and employment needs within their own boundaries before considering exporting growth to neighbouring authorities or the wider HMA. Equally, neighbouring authorities will not accept accommodating any of the Black Country's needs if this exercise has not been thoroughly undertaken. Telford and Wrekin has so far declined to assist in meeting any of the Black Country's shortfall given this exercise had not been undertaken. As such this option should only be considered as a last resort.
- 2.69 On this basis the Black Country should be seeking to accommodate all of its proposed growth within its own boundaries.



**Q21. Do you think that changes are required to policy DEL1 to ensure it covers both development within the existing urban area and any within the Green Belt?**

- 2.70 As set out in our response to Q1 a full review of the BCCS is necessary. This applies to Policy DEL1 also, particularly as the policy currently only reflects development within the urban area.
- 2.71 Given the characteristics and viability matters which differ between brownfield and greenfield sites, the BCCS Review should have separate policies for each.

**Q25. Will there be any new social infrastructure requirements necessary to serve large new housing developments? If yes, please explain the type and scale of any new social infrastructure required.**

- 2.72 Please refer to response to Question 28.

**Q28. Do you think physical infrastructure is necessary to serve large new housing developments? If yes, what type and scale of physical infrastructure is necessary?**

- 2.73 Paragraph 5.7 of the I&O Report sets out that as options for the location of major new housing allocations develop through the review process, so will decisions about the need for any such facilities and their locations.
- 2.74 This approach will be necessary to understanding the full infrastructure requirements for new sites. As set out in response to Q2, the infrastructure assessments to be undertaken will be crucial in understanding these requirements further. This should also be informed by any site specific evidence base work undertaken by developers, as well as liaison with infrastructure providers (including statutory undertakers).

**Q29. Do you think there are any other tools or interventions that could be used to ensure enough infrastructure is provided by developments?**

- 2.75 As set out in response to Q2, the infrastructure assessment work to be undertaken by the authorities will be critical to informing what infrastructure will be necessary to unlock new development.
- 2.76 Since the BCCS was adopted it is apparent that it is unviable for some brownfield sites to deliver the necessary infrastructure to assist their delivery (as much is acknowledged at Section 2 of the I&O Report). The four authorities should therefore satisfy themselves that it is viable for new development to contribute towards providing infrastructure to meet their needs, including through Section 106 contributions or the Community Infrastructure Levy, and that any onerous policy requirements in relation to matters such as housing mix, sustainable design features etc, does not compromise viability.
- 2.77 Other tools and interventions should not be relied upon if they have not been confirmed as available to improve infrastructure before the BCCS Review is adopted.

**Q31. Do you think that the right scale and form of funding is available to support the delivery of the Core Strategy Review? If no, what alternative sources of funding or delivery mechanisms should be investigated?**

- 2.78 The recently published WMCA Land Delivery Action Plan identifies sources of funding and immediate priorities. Of the £200m Land Remediation Fund, £53m is already

allocated to the Black Country and a further strategic package of £97m is available to be drawn down by the LEP. However, the plan states on page 44 that “to fund the current pipeline of brownfield sites in the Black Country, a total of £700m of further LRF funding is required”. This, it states, will be a key requirement of the Housing Deal the WMCA is hoping to negotiate with CLG.

- 2.79 Whilst the funding to date is a good start, it is clear that it is a fraction of the total needed to deliver a substantial step change in brownfield delivery. As set out in our response to Q29, it is crucial the four authorities are satisfied of the scale and pace of delivery and that it is viable for new development on brownfield sites to contribute towards providing infrastructure to meet their needs. The role of greenfield locations to deliver market housing and contribute fully to meeting infrastructure costs should therefore be a key component to derisk the BCCS housing strategy.

**Q32. Do you think that the proposed approach to incorporate health and wellbeing issues in the Core Strategy review is appropriate? If no, please provide details**

- 2.80 Please refer to response to Question 34b.

**Q33. Is there more that the Core Strategy can do to address health and wellbeing issues in the Black Country? If yes, is a new policy needed to address such issues for example?**

- 2.81 Please refer to response to Question 34b.

**Q34a. Do you agree that the health and wellbeing impacts of large development proposals should be considered at the Preferred Spatial Option stage of the Core Strategy review through a Health Impact Assessment approach?**

- 2.82 Please refer to response to Question 34b.

**Q34b. What design features do you think are key to ensuring new development encourages healthy living, which could be assessed through the HIA process?**

- 2.83 We support the strategy to incorporate health and wellbeing issues in the BCCS Review. Health and wellbeing underpin sustainable planning and creating places where people want to live.
- 2.84 The Health and Wellbeing Technical Paper (June 2017) emphasises the importance of integrating health and wellbeing into all policies, including those of the emerging BCCS Review. In particular, the technical note encourages the creation of communities which are:
- Well-connected and walkable;
  - Have a wide choice of homes;
  - Accessible to services; and
  - Where people can belong to a cohesive community which fosters diversity, social interaction and social capital.

2.85 As such, health and wellbeing should not be standalone policies in the plan, but rather should be a 'golden thread' running through the review and all policies. Any sites promoted through the Local Plan process should demonstrate their health and wellbeing benefits if they are to be proposed for allocation.

2.86 As demonstrated by the Vision Document (**Appendix 3**) submitted with these representations, health and wellbeing are key principles at the heart of the proposals for Columba Park. It will include significant new green infrastructure accessible to the public, such as new parkland. New community facilities will also be delivered. New pedestrian and cycle links will form a key component of the proposals, linking the site to Barr Beacon and Sutton Park.

**Q35. Do you support the proposed approach to housing land supply? If no, please explain why.**

2.87 The BCCS Review proposes at paragraph 6.30 to 'update' Policy HOU1. As set out in our response to Q1 a full review of the Plan is necessary given there are now greater housing and employment needs, the NPPF has been published and the WMRSS has been revoked, and the adopted BCCS has not been delivering the required level of growth. As such the approach to housing land supply should be reviewed in full also.

2.88 Given there is a shortfall of 3,039 dwellings against the targets set in the adopted BCCS, largely as a result of brownfield sites not being developed due to viability issues, the Review should include a 10% lapse rate should be applied to the requirement to ensure flexibility in deliverability should sites in the supply not come forward.

**Q36. Do you think that the current accessibility and density standards set out in Policy HOU2 and Table 8 should be changed? If yes, what standards should be applied instead, for example should the minimum net density of 35 dwellings per hectare be increased to maximise brownfield housing delivery?**

2.89 Please refer to response to Question 42.

**Q40. Do you agree that the 2017 SHMA findings should be used to set general house type targets for the Plan period? If no, please explain why.**

2.90 Please refer to response to Question 42.

**Q42. Do you agree that the annual affordable homes target should be increased to reflect the 2017 Black Country Strategic Housing Market Assessment? If no, please explain why.**

2.91 The NPPG states that wherever possible, local needs assessments should be informed by the latest available information and the government's official population and household projections are generally updated every two years.

2.92 The affordable housing requirement, preferred housing mix and types for the Black Country therefore need to remain fluid in order to respond to the most up to date evidence and market conditions. The BCCS Review should not comprise policies that set standards for the whole Plan Period. The standards set out in Policy HOU2 should be reviewed in full to ensure they comply with the NPPF, PPG and the most up to date guidance.

2.93 Columba Park will be capable of delivering a range of house types, including high quality larger 'professional / executive' type housing which is currently in short supply in Walsall and results in residents moving out the borough to find suitable housing.

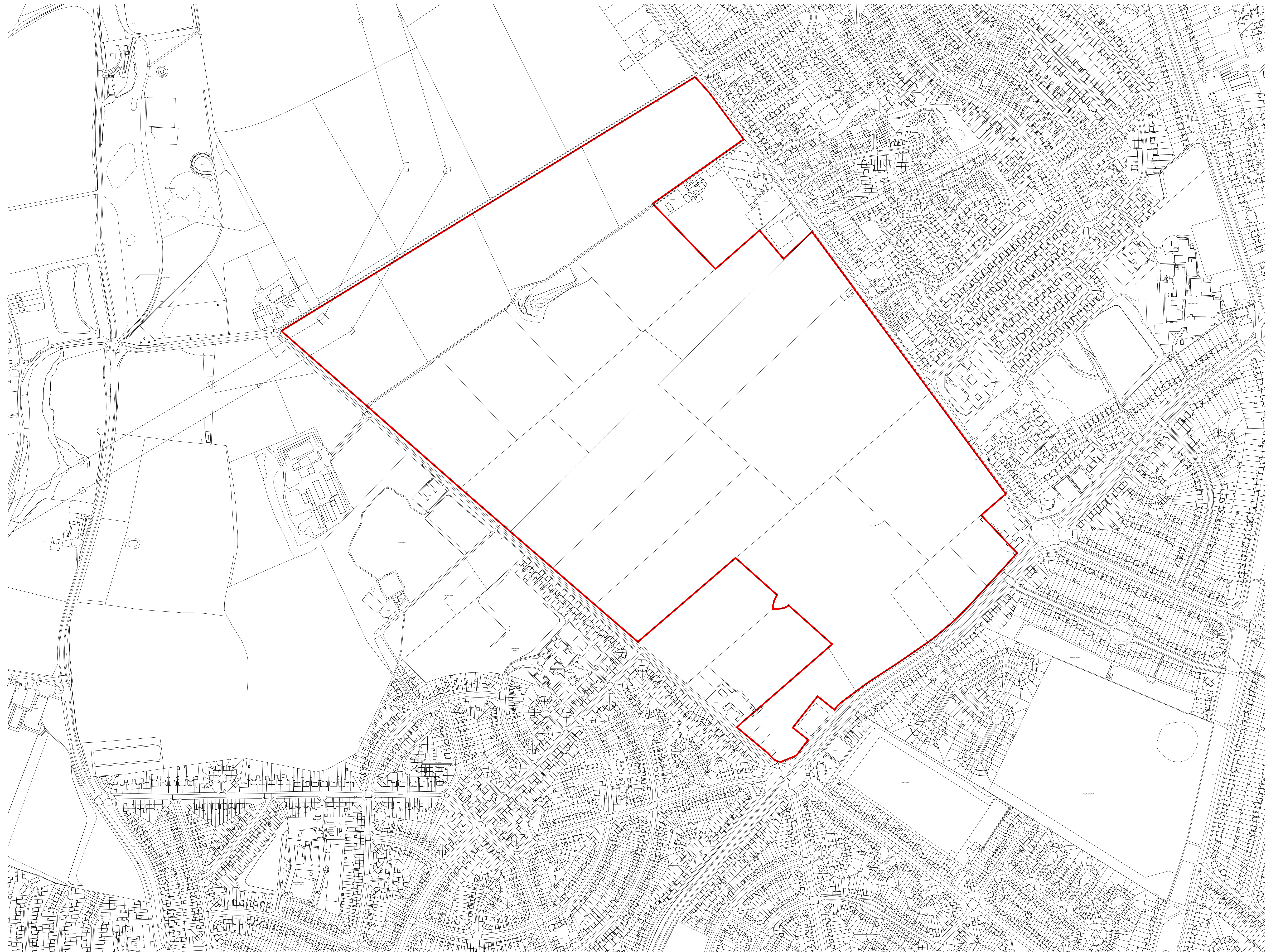
### 3. Conclusion

- 3.1 We welcome the opportunity to engage with the Black Country authorities in respect to the emerging BCCS Review.
- 3.2 Since the Black Country Core Strategy (BCCS) was adopted in February 2011 the West Midlands Regional Spatial Strategy has been revoked and the National Planning Policy Framework has been published, representing a significant change in the planning policy context. The Black Country's ambitious housing and employment needs are now much greater, and the area has not been meeting the targets set out in the BCCS. A full review of the Plan is therefore necessary to ensure it is robust and meets the requirements of national planning policy.
- 3.3 In meeting the proposed level of growth Green Belt release will be necessary. IM is promoting land at Columba Park for approximately 1,500 new homes, a new park, open space and community facilities. The site is in a sustainable location and can make a significant contribution to meeting the Black Country's housing needs.
- 3.4 Sustainable Urban Extensions such as that proposed at Columba Park can play a critical role in meeting the Black Country's anticipated level of housing growth. It will provide a critical mass which can sustain new services and facilities on the site, and will deliver environmental benefits, contributing to the health and wellbeing of existing and future residents.
- 3.5 We trust that the information provided within these representations will be considered by the Black Country Authorities and we welcome the opportunity to engage and promote the site through the progression of the BCCS Review,
- 3.6 We would welcome meeting the Black Country authorities to discuss these representations and the enclosed Vision Document and Call for Sites form.

# Appendix 1: Site Location Plan



Site Boundary



Rev	Drawn	Check	Date	Checked By

**PRELIMINARY**

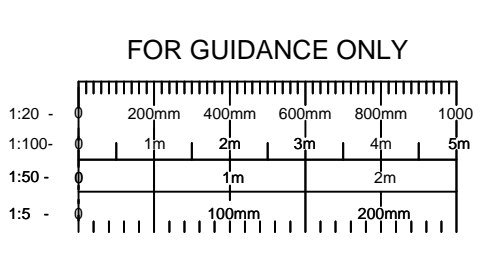
**BROWN HILL HAYWARD BROWN**  
 CHARTERED ARCHITECTS  
 GEORGIAN HOUSE, 24 BIRD STREET, LICHFIELD, STAFFS, WS14 1PT  
 TEL: 01827 22001 FAX: 01827 82800 E-MAIL: mh@brownhillhaywardbrown.co.uk

Client: **IM Properties**

Project: **Questlett Road, Walsall**

Title	Location Plan
Scale	1:200 @ A1
Drawn By	CC
Checked By	MM
Drawing Number	1/242/02
Revision	

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## **Appendix 2: Call for Sites Form**



## **Black Country Core Strategy Review - Call For Sites Form**

**The four Black Country Authorities (Dudley, Sandwell, Walsall and Wolverhampton) are inviting land owners, developers and other bodies to put forward sites to be considered for development as part of the Black Country Core Strategy Review.**

Call for Sites submissions should only be made for sites within the Black Country or sites within neighbouring authorities but adjoining the Black Country urban area. However, submissions will be accepted for any site within a neighbouring authority which could potentially form part of a larger development which would adjoin the Black Country urban area, to allow discussions to take place with adjoining authorities. If your submission relates to a site which stretches beyond the Black Country into a neighbouring authority then this should be clearly stated and evidence of submissions to that neighbouring authority provided.

**This form asks you to provide details about the site including location, ownership, current use, access, constraints, services and possible future use. Please provide as much information as possible to ensure your site proposal can be carefully considered. You can submit as many sites as you wish by completing a separate form and site boundary for each site.**

It should take around 15 minutes to complete the information for each site you wish to put forward, depending on the amount of detail you wish to provide.

If you are acting on behalf of someone else you will be asked to provide their details.

The information you provide will be used to help prepare the Core Strategy review and will be shared with other employees or agencies (such as the Planning Inspectorate) who may be involved with the process. Please note that the local authorities are obliged to make the Call for Sites submissions available for public inspection. This means that, with the exception of telephone numbers, email addresses and signatures, your comments and other personal details that you provide will be publicly available. We therefore encourage you to avoid providing sensitive information that you do not wish to be published.

If you have any queries about the questionnaire please contact:  
[blackcountrycorestrategy@dudley.gov.uk](mailto:blackcountrycorestrategy@dudley.gov.uk)

call: Dudley: 01384 814136 | Sandwell: 0121 569 4249 | Walsall: 01922 658020 |  
Wolverhampton: 01902 554038

**Please complete and submit by 5pm on the 8<sup>th</sup> September 2017.**

Please provide your up-to-date contact details. If you are acting on behalf of someone else you will be asked to provide their details later in the questionnaire. Fields marked \*will not be shared with anyone outside the Core Strategy review process. The contact details you provide will be held securely but we are required to publish your name and / or organisation alongside your submission.

**1. Title**

Miss

**2. First Name**

Alice

**3. Last Name**

Fitton

**4. Organisation/Company Name (where relevant)**

Turley

**5. Address Line 1\***

9 Colmore Row

**6. Address Line 2\***

Birmingham

**7. Address Line 3\***

**8. Post Code\***

B3 2BJ

**9. Email Address\***

Alice.fitton@turley.co.uk

**10. Phone Number\***

0121 234 9114

## Details for Site

11. Are you acting on behalf of someone else? Tick one only.

No

Yes - on behalf of someone else (you must provide details in Q36)

**The following questions ask about the ownership of the site and vehicle access**

12. What is your / your client's interest in this site? If you are an agent please answer on behalf of your client only. Please select all that apply.

Sole owner

Part owner

Potential Purchaser

Developer - you intend to construct the development yourself if the site is allocated and planning permission is subsequently obtained.

Operator - you intend to operate the development yourself, e.g. manufacturer, hotel, mineral extraction.

Public Body or Utility Company

Amenity / Community Group

Local Resident

Other - Please specify

If other, please specify.

Land promoter

13. Please provide details of the other owner(s) if known.

Mrs E. Edgeworth & Mrs J. Lishman  
Mr D. Burns & Mrs L. Lawrence  
Walton Homes Ltd.  
Mrs P. Richards & Mr E. Seston  
The Great Barr Lands Trust  
Mr C. Detloff & Mr B. Brewer

14. Does the other owner(s) support your proposals for the site? Tick one only.

Yes

No

Don't know

15. Is there direct vehicle access to the site i.e. from a public road? Tick one only.

Yes

No

Don't know

## Details for Site

16. Please provide information about the ownership (if known) of any land that would be needed to provide vehicle access.

N/A

## Details for Site

The following questions ask about the location of the site. You are required to map the location of the site using a link on the consultation website once you have completed this questionnaire.

**17. Site Name**

Columba Park

**18. Site Address**

Land at Queslett Road/ Aldridge Road, Walsall

**19. Postcode**

B74 2DT

**20. Site Area in Hectares**

82ha

**21. Site Area in Hectares of land suitable for development, if different to above**

42ha

**22. Please provide a brief summary of the current use(s) of this site or last known lawful use(s)**

Agricultural/ grazing

## Details for Site

The following questions ask what you think the site could potentially be used for, what services are available and any related constraints on the site.

23. What use or mix of uses do you propose for this site? Please tick all that apply.

- Private Market Housing
- Affordable Housing
- Industry or Storage (Use Classes B1b/c, B2 or B8)
- Offices (Use Class B1a)
- Gypsy and Traveller/ Travelling Showpeople Site
- Waste Management
- Mineral Extraction

- Retail
- Open Space or Sports Pitches
- Community Facilities (including health or education)
- Sports / Leisure
- Any other use (please specify below)

Any other use or a more specific proposed use for the site e.g. type of employment or type of open space please specify

N/A

24. If housing or employment is proposed, please specify how many homes or how many hectares of employment land you think could be accommodated on the site.

Circa 1,500 homes

25. What services are currently available at this site? Tick all that apply

- Mains water
- Mains sewage
- Electricity
- Gas
- Oil
- Broadband
- None
- Not Known

**26. What constraints, if any, affect this site? Please provide details below for each constraint.**

- Land in other ownership must be acquired to develop the site
- Restrictive covenants - what land uses do these prevent or require?
- Current use needs to be relocated
- Rights of way (public or otherwise) across the site
- Contamination known or suspected
- Previous mining activity known or suspected
- Public Open Space
- Flood risk / drainage problems
- Ground instability (not linked to mining)
- Watercourse / culvert / other water body
- Area of mature woodland / tree preservation order
- Undulating or steeply sloping ground
- X Underground services
- X Pylons crossing the site / sub – station
- Constraints on adjoining land e.g. railway line, noisy industry
- Protected species / habitats
- X Historic building / landscapes
- None of these

Please provide supporting details for each constraint identified above.

There is a 450mm aqueduct pipe running along the western boundary, which has been taken account of in the development masterplan.

Pylons cross the northern corner of the site, however this area does not form part of the 'developable land'.

The site is affected by the Great Barr Conservation Area.

**27. Is the site agricultural land? If so, then what is the agricultural land classification? Please provide survey results, including mapping.**

Yes, some is recorded as grade 3 (good to moderate), however further testing will need to be undertaken.

28. **If there is a current use of the site that needs to be relocated what arrangements are required to achieve this relocation? e.g. manufacturer currently on the site needs to move to a building of xx square meters with good access to the motorway.**

The land parcels included within the promotion do not include business premises that will require relocation.

29. **What new infrastructure do you think will be required to support the development of the site?**

- Major Roads
- Flood mitigation system
- X Primary School
- Secondary School
- X Local shops
- A new local centre
- X A new park / open space
- X Footpaths and cycleways
- Other

Please provide supporting details for the above.

Studies are currently being undertaken to understand infrastructure requirements associated with development of the site.

30. **Are there any existing or historic planning permissions on the site? If yes please include any details e.g. application reference number.**

- Yes                                      X No                                       Don't know



31. **Is the land available immediately for development (subject to obtaining any necessary planning permissions)? Tick one only.**

Yes  No  Don't know

If no, please explain why not and give an estimated timescale for when it will become available.

32. **Is there any current market interest in the site, other than from you / your client? Tick all that apply.**

- Owned by developer
- Under option to developer
- Enquiries received from prospective purchasers / developers
- Site being marketed
- None
- Not known

**Please provide further details of the market interest in this site.**

Part of the site is owned Freehold by a developer (Walton Homes).  
The remainder will be subject to a Promotion Agreement, where phases will be taken to the market following planning consent.  
Interest has been expressed by plc housebuilders to date.

33. **Once started how many years do you think it would take to develop the site?**

**Circa 8**

34. **Do you think it is likely that there will be viability issues with developing the site that will require the use of external funding?**

No

35. **Have you previously contacted a Black Country or neighbouring authority about this site? Tick one only.**

Yes  No

If yes, please provide brief details e.g. who you contacted and when and the current position of discussions.

Part of the site has been promoted by individual land owners previously

**36. Please provide any additional comments you may have that are relevant to the site you are putting forward.**

The site is being comprehensively promoted by IM Land to demonstrate its delivery in the short-medium term. A Vision Document, backed up by detailed evidence accompanies IM Land's 'Issues and Options' submission, showing that there are no technical constraints that would prevent a scheme of approximately 1,500 units coming forward.

**37. Each site will need to be visited to enable an assessment of the site. By completing this form you consent to Council employees (or their representatives) visiting the site. Visits will be conducted unaccompanied wherever possible. Where there are reasons why an unaccompanied site visit would not be practical please indicate below so that alternative arrangements can be made.**

N/A

**If acting on behalf of someone else please provide details here**

**Please provide the details of the individual or organisation you are representing. Please ensure you have consent from the individual or organisation prior to providing their details. Fields marked \*will not be shared with anyone outside the Core Strategy review process.**

**38. Title**

**39. First Name**

**40. Last Name**

**41. Organisation / Company Name**

IM Land Ltd

**42. Address Line 1\***

C/O Agent

**43. Address Line 2\***

**44. Address Line 3\***

**45. Post Code\***

**46. Email Address\***

**47. Phone Number\***

**48. Has the landowner been informed of this Call for Sites submission? Tick one only.**

Yes

No

## **Site Boundary**

**The boundary of your site must be mapped and provided on an OS based map at a scale that shows field, property and adjacent road boundaries.**

**All of the site boundaries and Call for Site forms will be reviewed by the four authorities for accuracy. Following this all mapped sites will be visible to the public.**

**If you would like us to consider other documents, such as draft layout plans, masterplans or design statements, please attach these to your site submission.**

**Thank you for submitting your site details. If you wish to submit details for further sites please complete a new form.**

## **Appendix 3: Vision Document**

# Columba Park

September 2017

Prepared by BHB Architects on behalf of IM Land



## Contents

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Project: Columba Park, Walsall

BHB Architects  
Georgian House  
24 Bird Street  
Lichfield  
Staffordshire  
WS13 6PT

01543 254357  
mail@bhbarchitects.co.uk

Project Ref:	3242
Status:	FINAL
Date:	September 2017
Revision:	-
Prepared by:	CC
Approved by:	MW

Barr Beacon Hill War Memorial



*Queslett* was first known in ancient English as *Quieslade* - meaning 'valley of the wood pigeon'.

*'Columba'* is the biological classification of the wood pigeon.



# 1. Introduction

*This document sets out a vision for sustainable growth.*

This document sets out an exciting and deliverable vision for sustainable growth in Walsall and forms part of a suite of documents that demonstrate the unrivalled opportunity to create a new community and high quality green infrastructure at the site to the north of Queslett Road East, Walsall. The proposals would contribute to boosting significantly the supply of housing in Walsall and the wider Black Country, whilst opening the site up to public access, significant landscape improvements and enhanced biodiversity opportunities.

This document draws on the technical evidence base which has been prepared for the site by specialist consultants, as well as the evidence which will underpin the Black Country Core Strategy Review.

The document illustrates a vision for the creation of a new community; Columba Park, which could provide around 1,500 new dwellings. The site gives an opportunity to create a new neighbourhood which delivers real health and wellbeing gains and economic benefits for both existing and new residents. This includes significant high-quality public open space and green infrastructure, well designed homes, and new community facilities.



The site's Promoters, IM Land, are a team of experienced professionals specialising in the promotion of sites for residential-led development. The team has a wide range of experience including work for major PLC housebuilders, and local government.

IM Land are part of IM Properties, one of the UK's largest privately-owned property companies, with an investment and development portfolio across the UK, Europe and the USA, and projects spanning the industrial, retail, office and residential sectors.

IM Properties is committed to securing high quality, long-term investments and developments through a fair approach to business.

To support the promotion of this site, IM Land have assembled an experienced team of professional technical experts in respect of planning, design, landscape, highways, heritage, ecology and arboriculture to ensure that the proposed development is of the highest calibre with the least possible impact on the surrounding environment.

*“Our vision is for a high quality residential development, which enhances the existing qualities of the area by creating an attractive and interactive environment for future and existing residents whilst respecting its landscape setting.”*



## 2. Strategic Perspective

*This document sets out a vision for delivery of new homes to meet the housing needs of both Walsall and the wider Black Country, whilst delivering significant benefits for the local community. It explores the contribution the site can make to housing the areas growing population and also providing it with new, high-quality, public open space.*

As a Housing Market Area, there is significant need for greater housing delivery, with the current shortfall in supply arising from the Birmingham Local Plan standing at 37,900 dwellings. This is to be distributed amongst the Greater Birmingham Housing Market Area, which includes the Black Country authorities. At the sub-regional level, the Black Country has its own pressures, with the emerging Black Country Core Strategy (BCCS) Review and its associated evidence base demonstrating a need for 78,190 dwellings between 2014 and 2036 of which 24,670 may need to be found within the current green belt.

It is clear from the evidence published to date that the scale of growth needed is unprecedented. The Black Country's need for new homes cannot be met on land within the urban area alone and the growth should therefore be met in the most sustainable and deliverable locations such as at Columba Park.



Map showing the location of Columba Park and its surrounding context

Imagery (c) 2017 Google, Map data (c) 2017 Google

NOT TO SCALE

Columba Park presents a unique opportunity to combine meeting housing needs with the delivery of a well-planned, landscape-led proposal. No other site for 1500 homes in Walsall can bring with it the delivery of a unique parkland offer. One which will benefit not only the communities in the surrounding area and Walsall more generally, but also the greater Birmingham and Black Country.

Green infrastructure, natural spaces and community facilities contribute strongly to character and 'sense of place' and creating a better environment where people aspire to live. Its benefits include helping to meet recreation needs, supporting biodiversity, promoting health and wellbeing, and stimulating economic growth. Being involved at such an early stage in the project's inception, means IM Land are able to plan for more and better quality green infrastructure at the site, as this will form an essential component of sustainable growth in Walsall.

Improving health and wellbeing is a key part of the BCCS review, this is identified in the Health and Wellbeing Technical Paper (June 2017) which emphasises the importance of integrating health and wellbeing into all policies, including those of the emerging BCCS Review. The technical note encourages the creation of communities which are:

- Well-connected and walkable;
- Have a wide choice of homes;
- Accessible to services; and
- Where people can belong to a cohesive community which fosters diversity, social interaction and social capital.

Furthermore, the TCPA (Town and Country Planning Association) and Public Health England report, 'Planning Healthier Places' (November 2013) states that good quality, accessible green space and infrastructure can provide many potential health and well-being benefits. Green spaces can also help reduce health inequalities and that both the improvement of existing, and creation of new, green infrastructure should be prioritised.

Benefits will be achieved most successfully if green space creation and management are integrated with more traditional land development and built infrastructure, and are considered at a local level, not just site specific. The proposals for the site will therefore seek opportunities to link to existing green infrastructure, including Barr Beacon.



### 3. Parkland Proposition

*Building upon the health and wellbeing agenda mentioned in the previous section, it is proposed that a new public parkland would be delivered as part of the implementation of the proposals for approximately 1,500 new homes at Columba Park.*

The proposed park would extend from Queslett Road which forms the southern boundary of the site, opening up to its northern boundary towards the Barr Beacon.

This park would provide interconnectivity between the communities of Streetly and Pheasey, enhancing community access to and between existing assets such as Barr Beacon, Doe Bank Park and Sutton Park.





SUTTON PARK

COLUMBA  
PARK

DOE BANK  
PARK

BARR BEACON







## 4. Columba Park: The Opportunity

*Columba Park provides a unique opportunity to help meet housing needs, establish a public parkland offering recreational opportunities, enhancing accessibility and promoting active lifestyles.*

### Understanding the Place

It is recognised that an opportunity of this scale needs to be grounded in a sound appreciation of its context. Good planning and good design is about shaping development in response to the constraints and opportunities evident in the wider and immediate locality. We recognise that development on any scale would need to respect and respond to its context.

### Green Belt

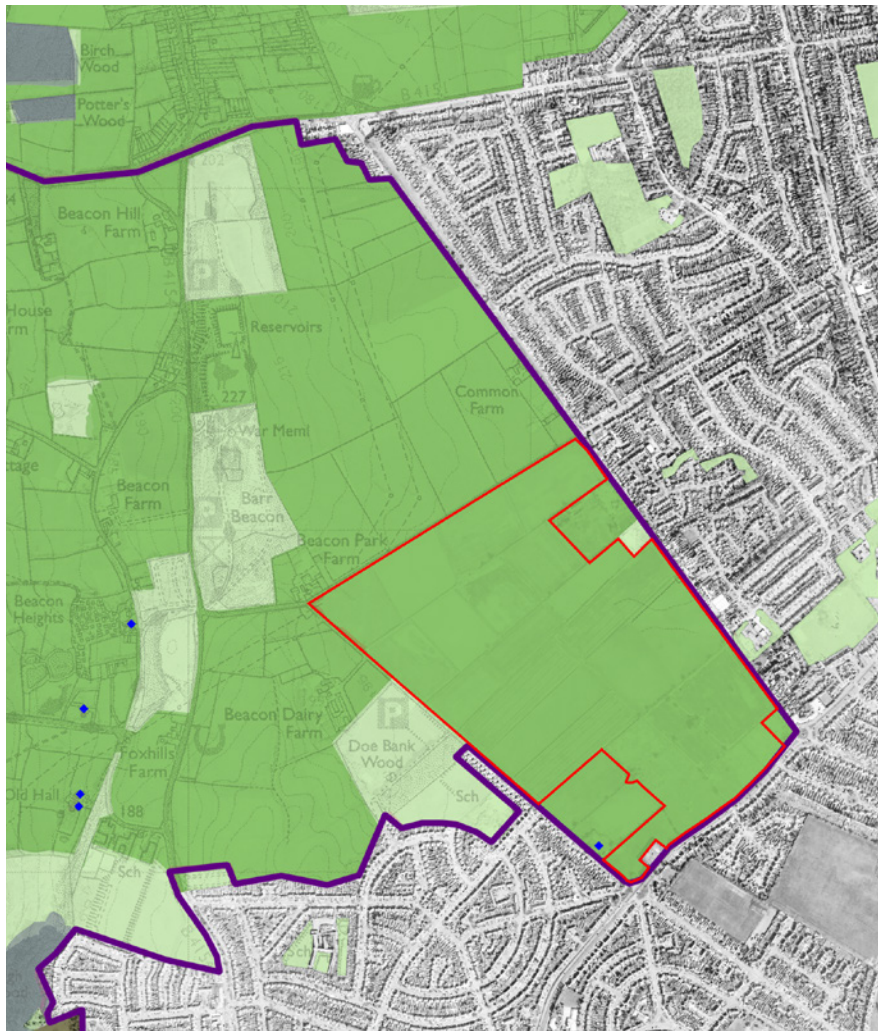
Columba Park is located within the Green Belt. As a whole, Walsall is significantly constrained by Green Belt (33% of the authority is currently within the Green Belt) although there has been no strategic review of it within the Black Country since the late 1970's.

The National Planning Policy Framework (NPPF) does not preclude development in the Green Belt, but does require that 'exceptional circumstances' can be demonstrated and the review of the Black Country Core Strategy provides the best opportunity to plan for sustainable growth in the Green Belt. Indeed the Issues and Options Report indicates that the Black Country will need to accommodate between 14,270 and 24,670 within its Green Belt.

The Black Country authorities intend to undertake a Green Belt Review over the next year. In advance of this work we have undertaken our own an assessment of Columba Park against the five 'tests' of the Green Belt below:

<p>Purpose 1- To check the unrestricted sprawl of large built up areas</p>	<p>The site is bound by residential development to the east, south and west. As such the site is enclosed by existing built form along three boundaries. The opportunity exists for the parkland proposed to the north of the site to provide a stronger Green Belt boundary to the north, creating an enduring physical feature.</p>
<p>Purpose 2- To prevent neighbouring towns merging into one another</p>	<p>The site presents a gap in the urban form. Releasing the site would therefore not result in any neighbouring towns merging.</p>
<p>Purpose 3 - To assist in safeguarding the countryside from encroachment</p>	<p>The site is located within a gap in the urban form. It will create a significant level of green infrastructure which will open the site in part to the public. As such it will not result in a detrimental encroachment into the countryside.</p>
<p>Purpose 4 - To preserve the setting and special character of historic towns</p>	<p>The site is not located within close proximity to any historical town. The site will create a new green infrastructure buffer to the north, protecting the setting of Barr Beacon.</p>
<p>Purpose 5 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</p>	<p>The Black Country authorities are unable to meet their identified housing and employment needs within the urban area, and therefore require Green Belt release.</p>





- Site boundary
  - ◆ Listed buildings
  - Open space (Policy OS1)
  - Registered parks and gardens
  - Ancient woodland
  - Green Belt (Policy GB1)
  - Conservation Area
- All listed policies taken from draft site allocation document (SAD) (October 2016)

**Plan of Designations and open space near Columba Park**

Imagery (c) 2017 Google, Map data (c) 2017 Google

NOT TO SCALE

**Landscape**

The landscape of the site currently consists of small to medium-scale arable fields, bounded by, largely intact, mixed native hedgerows. The landform rises gently towards the north-west, rising more steeply beyond the site boundary, before meeting the ridgeline upon which the Barr Beacon Monument is located. There are a number of well-established native trees within the site along hedgerows and along the alignment of lost hedgerow boundaries. There is currently no public access across the site.

The site is located within the south-eastern edge of the Great Barr Conservation Area which is a local landscape-related designation, but is not within or near to any other statutory or non-statutory landscape-related designation.

The site is visually enclosed by prominent residential development to the east along Aldridge Road and to the west along Doe Bank Lane and bounded by the A4041 (Queslett Road East) dual-carriageway and further commercial and residential properties to the south. To the north the landscape becomes increasingly rural, with long views towards arable fields, native woodland, dispersed farm houses and the Barr Beacon monument and associated Beacon Way long distance trail. The settlement edge along the eastern, western and southern boundaries of the site restricts the majority of more distant views into the site from surrounding areas.

Views would be available from residential properties along these boundaries, and from pedestrian and vehicle users along the road network, although the experience of these views is already heavily influenced by views of the settlement edge and noise and movement associated with the road network, especially the A4041 (Queslett Road East) dual-carriageway. More distant views from the north, available from the Barr Beacon monument and associated Beacon Way long distance trail, can be mitigated by the provision of green space and planting within the northern area of the site.



## Habitat and Ecology

The Columba Park site comprises mainly arable fields with minor areas of semi-improved grassland, delineated by predominately native but species-poor hedgerows. These habitats have limited intrinsic ecological and biodiversity value.

Mature standard trees are occasionally present within the sites hedgerow network, with two small copses of mature semi-natural broad-leaved woodland present to the south of the site. These features, which would not be replaceable within a generational lifespan (30 years or more), are proposed to be retained and buffered within the conceptual masterplan.

The proposals offer scope for enhancement of the ecological and biodiversity value of the site, through a combination of retention and management of the sites existing features of value and the creation of open parkland habitat within Columba Park.

The existing agricultural habitats lack structural or species diversity and offer extremely limited ecological function for faunal species in terms of foraging, shelter or ranging. The parkland habitats proposed within Columba Park, to include scattered trees, species-rich hedgerows, ponds and species-rich grassland, will be of benefit to local amphibian, reptile, bird, mammal and invertebrate populations and create greater connectivity to the wider landscape, particularly Barr Beacon and Doe Bank Park.









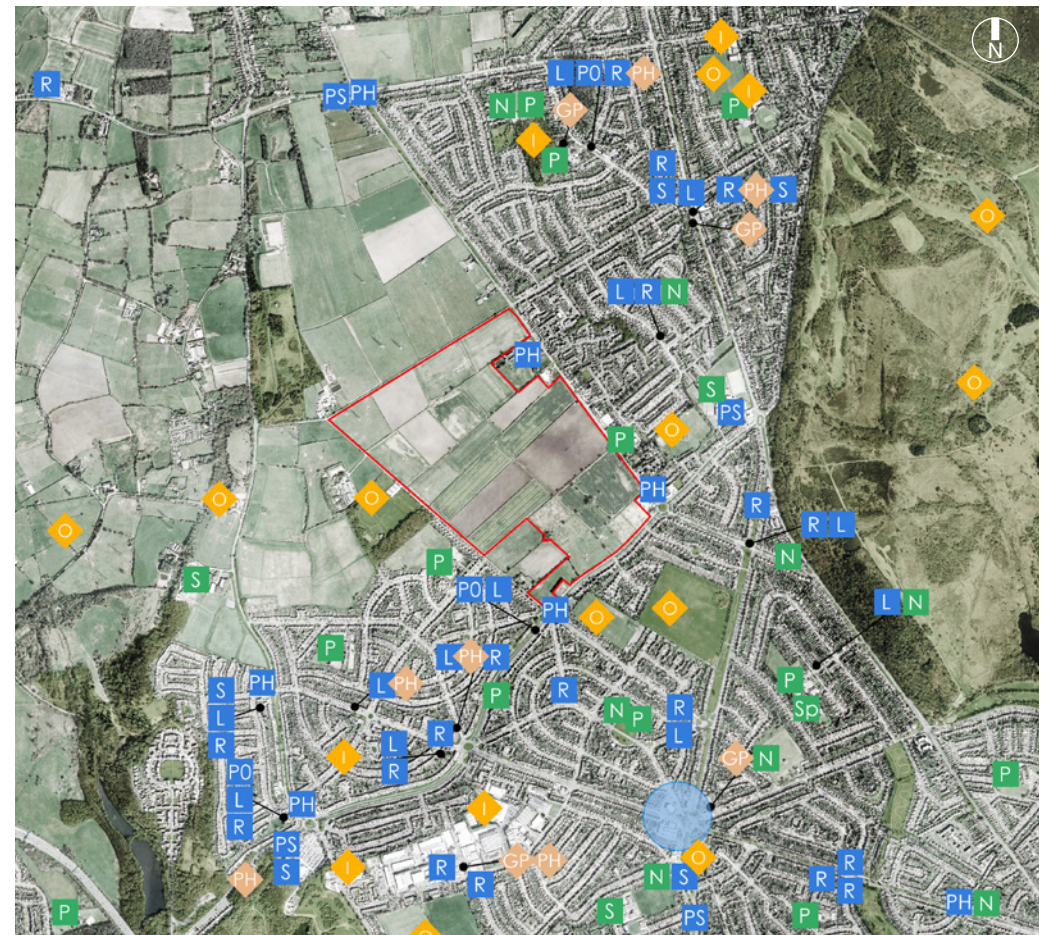
### Connectivity and Access to Facilities

The site is well located to existing facilities and amenities, including schools, doctors surgeries, supermarket, and public houses.

Public transport services including the 39, 997, 937, 78, 935 and 23 buses operate along the eastern, southern and western boundaries of the Columba Park site providing frequent access to Walsall, Birmingham and other key destinations. As the proposals emerge, consideration will be given to the integration and routing of services through the development area and discussions will take place with public transport operators.

Existing footways are located along Doe Bank Lane, Queslett Road East and Aldridge Road. Opportunities exist to improve accessibility to, from and across the site. These include footway extensions and improvements into the development area, the creation of new crossing points and the provision of improved cycle facilities to improve accessibility to key amenities and nearby National Cycle Route 535. Accessibility to Barr Beacon will also be improved and enhanced to enable safe and easy access.

Vehicular access to the site will be taken from Doe Bank Lane, Queslett Road East and Aldridge Road. Primary access will be formed from Queslett Road and it is likely to take the form of traffic signals. Multiple secondary access points could be formed from Doe Bank Lane and Aldridge Road to improve accessibility into the site. Both roads have a straight alignment and therefore visibility splays are not constrained and junctions can be designed accordingly to accommodate existing access points.



#### Education

- N Nursery
- P Primary School
- S Secondary School
- Sp Specialist School

#### Health

- GP Doctor's Surgery
- PH Pharmacy

#### Leisure

- I Indoor Venue
- O Outdoor Venue

#### Retail

- PS Petrol Station
- PH Public House
- PO Post Office
- L Local Shop
- R Restaurant/ Takeaway
- S Supermarket/major retailer
- Retail area  
(collection of shops/businesses)

### Accessibility of Community Facilities

Imagery (c) 2017 Google, Map data (c) 2017 Google

NOT TO SCALE







## Cultural Heritage

The existing character of the land is typical of a 19th century enclosure landscape, but prior to this it had formed part of Great Barr Commons. Although not remarkable in itself, the land rises to the north to the prominent landmark of Barr Beacon, and ancient focal point and currently the site of a war memorial. Registered Parks and Gardens lie to the east in Sutton Coldfield, and to the south-west around Great Barr Hall. Columba Park provides an opportunity to promote recreational use of these assets with a connecting green route through the new development. At present the site is included on the periphery of the extensive Great Barr Conservation Area, but the core heritage significance for the designation of this Area derived from Great Barr Hall and its surrounding parkland, rather than remote agricultural land, within which Columba Park sits, which is largely separated from the park by existing urban expansion.

There are no known archaeological assets within the site, but two grade II listed buildings are located on the south-western edge. These are Doe Bank Farm house and its associated barn. The proposed development will be designed sensitively to ensure that the contribution that the setting makes to their heritage significance is not significantly affected or changed. Historically the northern part of the site was used for a shooting range during the First World War, and this cultural connection is one that resonates with the war memorial at Barr Beacon. In the conceptual masterplan, this area would form part of the public park and would therefore not be developed. In conclusion Columba Park lends itself to sympathetic development that can enhance the experience of local heritage assets without adverse effects.

## Flood Risk

The land is located entirely within Flood Zone 1 (less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)).

An area of low risk surface water flooding is noted within the site however the introduction of site wide drainage systems will mitigate these impacts.

The site is underlain by sandstone and soakage testing has confirmed there is good potential for surface water drainage to be disposed of through soakage into the ground. All dwellings and buildings can therefore go to soakaways. Private highways and car parking area will drain via permeable paving. Adopted highways can drain to soakage basins located throughout the site and it is estimated 9,500m<sup>3</sup> of above ground attenuation would be required to cater for the 1 in 100 year plus 40% for climate change.

Foul drainage is likely to drain by gravity to existing sewers in Queslett Road East.

### Summary

*Our initial assessments in relation to impact on the green belt, landscape, heritage, flooding, ecology and highway infrastructure have not identified any issues which cannot be addressed through the planning process or which would outweigh the substantial benefits which Columba Park can deliver in terms of new homes, community infrastructure and public open space.*

## 5. Contextual Analysis

*The framework of the site has evolved from an appreciation of the local character and an understanding of key views. The site is well connected to existing services and can deliver enhanced community facilities; it includes strong green infrastructure; and can deliver a logical and sustainable expansion of the existing communities.*

New development can fully integrate existing hedgerows and trees into the landscape structure of the masterplan. The form of the development can also focus on areas which are already characterised by the prominence of the existing settlement edge, leaving the more elevated, prominent and more 'rural' areas relatively free of development. The proposed form of the development would also protect and enhance a central green way which would allow views towards Barr Beacon and provide an attractive, new, publicly accessible green corridor linking thousands of existing and new residents with this panoramic viewpoint.

The following plans illustrate our understanding of the site and define key concepts that can shape development going forward.

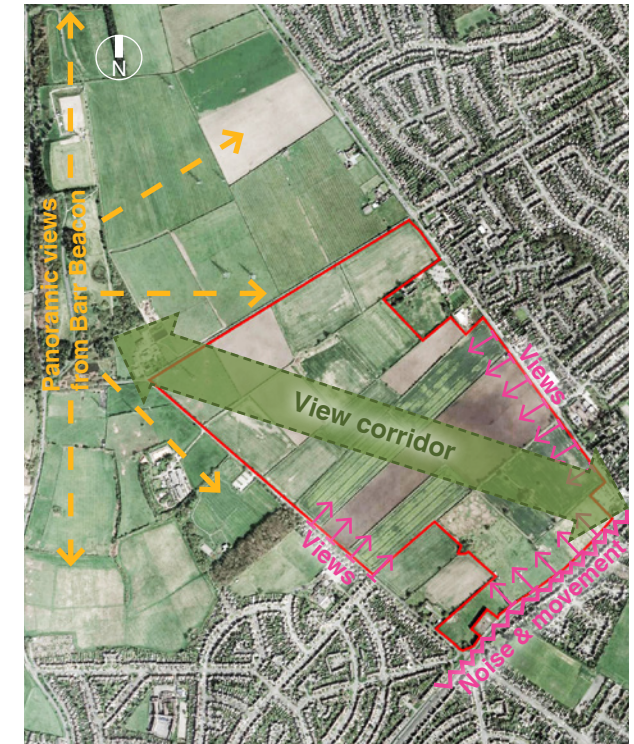


Step 1 - Landscape Context

Imagery (c) 2017 Google, Map data (c) 2017 Google

The landform rises gently towards the north-west, rising more steeply beyond the site boundary, before meeting the ridgeline upon which the Barr Beacon Monument is located.

The site is influenced heavily by the suburban edge to the south-east and becomes increasingly rural to the north, albeit that the north is also strongly influenced by prominent overhead powerlines.



Step 2 - Visual Context

Imagery (c) 2017 Google, Map data (c) 2017 Google

Views available from residential properties and pedestrian / vehicle users along the road network. The experience of these views is already heavily influenced by views of the settlement edge / noise and movement associated with the road network.

More distant views available from the north from the Barr Beacon monument and associated Beacon Way long distance trail.





### Step 3 - Urban Grain

Imagery (c) 2017 Google, Map data (c) 2017 Google

The distinct street layouts of the existing development to the south and east provide a variety of precedents for potential new housing layouts on the site.

To the east street layouts are largely linear, with generous pavements incorporating areas of green.

To the south the streets form strong geometric patterns, again with wide pavements, providing opportunity for parcels of green space and incidental public space where streets meet.

Within a new layout these street patterns could be utilised to create a pleasant urban environment in which development is interspersed with green features. A series of green pockets amongst the housing, leading to a green-way along the key south-north view corridor, and to potential new public open space of Columba Park in the north part of the site.




Geometric street patterns of local development creates opportunities for pockets of green space

## 6. Conceptual Framework

*The concept framework is informed by the sequence of key design steps. It shows the potential for high quality residential development and delivery of a publicly accessible park.*

This plan demonstrates the potential for a cohesive sustainable place, attractive to residents, visitors and wildlife. It envisages a scale of housing development that:

- Delivers approximately 1500 new homes and an extensive area of parkland and public open space
- Makes significant contribution to strategic growth ambitions and meets evidenced housing needs
- Balances built form and open landscape, creating a substantial parkland that can act as a major recreation asset
- Enhances landscape quality, wildlife value and biodiversity
- Creates and improves pedestrian and cycle links within and between existing communities
- Responds to natural topographic characteristics, shaping and enhancing local views
- Can properly address the park, providing valuable frontages and a safe environment
- Can contribute to the health and wellbeing of existing and new residents.


 Existing hedgerow, incorporating mature trees, providing good ecological value. To be retained and enhanced where possible


 Existing Species-rich hedgerow


 Existing hedgerow, providing important ecological connectivity across site - to be retained where possible


 Proposed Site Access, linking into surrounding highways network

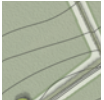
 High Point of Site (Maximum site level +200.0m AOD)

 Key Landmark within existing landscape

 Proposed Pedestrian linkages

 Extent of development to minimise potential visual impact on higher ground

 Opportunity for potential improvements to Green Infrastructure

 Clearly defined field boundary pattern characterises higher portion of site and landscape beyond. This character should be retained and enhanced where possible

 Surrounding urban fabric demonstrates a clear and legible grain





- 1 Lower Part of site provides an ideal location for on site attenuation.
- 2 Existing pockets of woodland. The connectivity between these could be improved as part of any scheme brought forward, increasing their ecological value
- 3 Existing field pattern could be strengthened, by the creation of a 'green-way' providing opportunities for public recreation and greater links across the site.
- 4 Existing local landscape features retained
- 5 Proposed linkage towards Barr Beacon Park
- 6 Proposed Linkage towards Doe Bank Park
- 7 Opportunity to strengthen existing landscape characteristics, extending existing woodland

Opportunities and Constraints Diagram



## 7. Conceptual Masterplan

*The conceptual masterplan illustrates how development proposals may respond to the sites context, integrating with the surrounding landscape and adjoining pattern of development.*

### The Proposals

The scheme proposes approximately 1,500 new homes to meet the needs of the Borough.

Integrated within these proposals is the creation of a new extensive area of public parkland.

The park offers the opportunity to provide a diverse range of recreational opportunities including formal and informal play, sports pitches, cycle tracks and footpaths.

The park could greatly enhance connectivity to, from and between existing communities and facilities including Barr Beacon park and Doe Bank Lane park by providing pedestrian and cycle friendly routes.

The park could contain a unique range of landscape character. These areas could be linked by a series of interconnected pathways and cycle ways.

There is the potential for new habitat areas, woodland, wetland or sensitive grassland areas crisscrossed by pathways, where nature can be viewed easily and safely, close up and first hand by all.

### Masterplan Elements

#### Built Form

The extent of development has been informed by details landscape assessment and responds to the site's topography.

There is opportunity to enhance and compliment the strong geometric development patterns that are characteristic of the existing area.

#### Connectivity

Running north-south the parkland creates a pedestrian and cycle friendly green corridor which, following the natural topography of the site, meanders from Queslett Road to Bridle Lane and Barr Beacon Park beyond.

Running east-west a series of green routeways are established which link into the main parkland, these routeways typically follow existing field boundaries and hedgerows and provide strong connectivity between Doe Bank Lane, Doe Bank Park and Aldridge Road.

#### Landscape and Ecology

The retention of existing ecology and landscape features are integral to the scheme proposals. Such features forming key parts of the proposed park and interconnected greenways.

- 1 Sutton Park
- 2 Denotes Walsall Borough boundary
- 3 Parkland edge/location for SuDs
- 4 Formal landscape character area with tree lined main avenues providing access
- 5 Green routes running east-west
- 6 Informal parkland character - provides transition to existing rural character beyond
- 7 Existing habitat retained and enhanced
- 8 Existing feature retained for community recreational use
- 9 Proposed linkage to Barr Beacon Park
- 10 Barr Beacon Park
- 11 New connection to Doe Bank Park playing fields.









## 8. Delivery

To meet the levels of housing need identified in the BCCS Issues and Options Report, 'large scale', well-planned, housing sites, such as Columba Park, will be necessary to deliver the sustainable new communities and infrastructure improvements which will be needed for the area.

However, we recognise that the scale, relative complexity and infrastructure requirements of such are project are significant. It is for this reason that we are currently undertaking all necessary technical studies and surveys to ensure that the lead-in time to commencement on site will be as short as possible. Contact has already been made with relevant statutory undertakers and utility providers and these discussions will continue to take place.

IM Land has the experience of already working on significant schemes such as Columba Park. IM Land is currently working collaboratively to deliver the largest Local Plan allocations within both Solihull and Stratford Districts at Blythe Valley Park and Gaydon Lighthorne and have worked to transform a former MOD base in Bath into a vibrant new residential community.



### Blythe Valley Park:

Acquired in 2014, IM worked collaboratively and constructively with the Local Authority to agree a new vision for a stalled business park near Junction 4 of the M42. The largest allocation in the Local Plan, a planning application for 750 homes, 250 bed housing with care facility and over 1 million square of commercial floorspace was granted in March 2017. Work has already commenced on site and the first new homes will be occupied in 2018.

### MOD Ensleigh:

IM Land worked in partnership with Bath & North East Somerset Council to transform this former MOD site, on the edge of an Area of Outstanding Natural Beauty. Working hard to deliver the authority's aspirations, we developed a vision for a desirable community and are now delivering approximately 300 homes a 72 bed housing with care facility and a new primary school for over 200 pupils. The first to be delivered in that authority for several decades.



*Using our experience of these projects and our years knowledge gained elsewhere within the industry, the project will be designed with delivery as a fundamental consideration. The conceptual masterplan is already evolving in such a way that the project could accommodate several 'outlets' for a number of housebuilders and as such we would estimate that peak build out for the site could be in the region of 150-200 dwellings per annum.*



## 9. Narrative Illustrated

*Columba Park presents a unique opportunity to create a genuinely sustainable new community which would deliver a range of much needed housing, as well as new public parkland.*

### The Vision

IM's vision for Columba Park is bold and inclusive. It aims to deliver a unique and modern piece of Green Infrastructure for the area that could:

- Enhance public access for passive recreation, walking and cycling
- Create areas for active recreation, trails, woodland activities and events
- Enhance local access to resources such as Barr Beacon and Sutton Park
- Increase biodiversity and enhance natural habitats
- Foster the restoration of important landscapes and ecological features
- Enhance sustainability prospects and encourage healthier lifestyles and community wellbeings

Columba Park will be an integrated environment, balancing the needs of ecology, nature conservation, habitat biodiversity as well as providing valuable access to outdoor recreation and leisure facilities. Its integration with neighbouring communities and associated residential development could make a valuable contribution to the overall quality of life and the promotion of outdoor activities and wellbeing in the Borough.











Artists Impression - proposed view from Columba Park looking south towards new development







## Landscape Led Development

Columba Park could serve a variety of residential users providing interconnectivity between the communities of Streetly and Pheasey and enhancing community access to and between existing assets such as Barr Beacon, Doe Bank Park and Sutton Park by providing pedestrian and cycle friendly routes. By investing in a new area of public parkland, a diverse range of recreational opportunities including formal and informal play, cycle tracks and footpaths could be provided which will see the promotion of healthier outdoor activity based lifestyles.



## Habitat and Access Management

Columba Park can be transformed from the existing agricultural fields into a managed parkland habitat, greatly enhancing the ecological and biodiversity value of the site. The parkland habitat and additional green infrastructure within the development will act as a habitat corridor through the site, creating greater connectivity to the wider landscape, particularly Barr Beacon and Doe Bank Park.

Management of the scattered trees, species-rich hedgerows, ponds and species-rich grassland to be created within Columba Park will result in increased structural and species diversity within the sites habitats. The management will be of benefit to local amphibian, reptile, bird, mammal and invertebrate populations.

Access to the parkland will be via a designated pedestrian/cycle network. A further series of informal paths will create routes through specific areas of the parkland habitats, minimising impacts on the retained hedgerow network.



## 10. Benefits and Impact

*The comprehensive range of key benefits presented in the Columba Park vision, shows the exciting opportunity we have to create a new sustainable neighbourhood, promoting positive working between public and private sectors.*

### Community Benefits

Columba Park could deliver significant benefits for the Borough. It can help meet an identified need to deliver new, attractive and sustainable homes. The residential development could deliver around 1500 homes. The new homes could also create a diverse housing supply, including a mix of open market and affordable homes.

### Environmental Benefits

At the heart of the proposals is a green infrastructure strategy, the benefits of which will positively impact the region. The Columba Park proposal would include a significant amount of new open space, and the green infrastructure strategy will be dynamic and multifunctional. This will lead to vast improvements in the biodiversity of the wider area.

### Economic Benefits

Columba Park can deliver significant economic benefits for Walsall Borough and the wider West Midlands region. During both the construction and operational phases.

The construction of the proposed development will generate initial benefits by directly supporting 180 gross full time equivalent jobs employment in addition to indirect and induced benefits associated with supply chain and employee spend. The construction phase of the development will also significantly increase economic activity (measured as Gross Value Added) by around £151.3 million within the wider economy.

The positive economic impacts of Columba Park will be experienced for long after the construction phase by providing a range of local benefits as the new homes are occupied. The proposed mix of homes is expected to attract a full range of households including working-age, economically active households and families. Through the delivery

of family housing the proposed development will help to sustain a balanced population and community, providing an essential foundation for securing the long-term security of key services such as local schools.

The attraction of economically active households to the local area will result in increased levels of disposable income. The new residents are expected to generate £16.7 million in retail expenditure and £9.1 million in leisure expenditure each year, which will help to sustain local shops and services and contribute towards the competitiveness of the local area.

The development of new homes will also significantly boost Walsall Council revenues through the generation of £2.3 million additional Council Tax annually and a total of £7.4 million in New Homes Bonus payments. This revenue will support investment in maintaining and enhancing local infrastructure and the built and natural environment.

# 11. Summary

*This document has demonstrated how and why we believe that residential development at Columba Park represents a unique opportunity for positive and beneficial growth within the Walsall Borough.*

In summary, the development of Columba Park offers the opportunity to:



Deliver around 1500 much needed homes. The new homes could also create a diverse housing supply, including a mix of open market and affordable homes



Provide new public open space with the potential for children's natural play created through the inclusion of a strong green infrastructure strategy



Retain existing natural assets and enhance them improving the biodiversity of the wider area

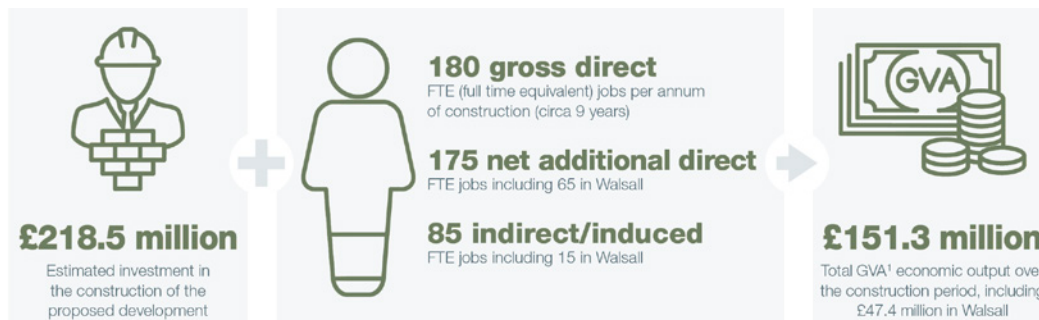


Create new greenways with footpath and cycle routes linking Barr Beacon and Sutton Park, making these existing areas of public open space more accessible

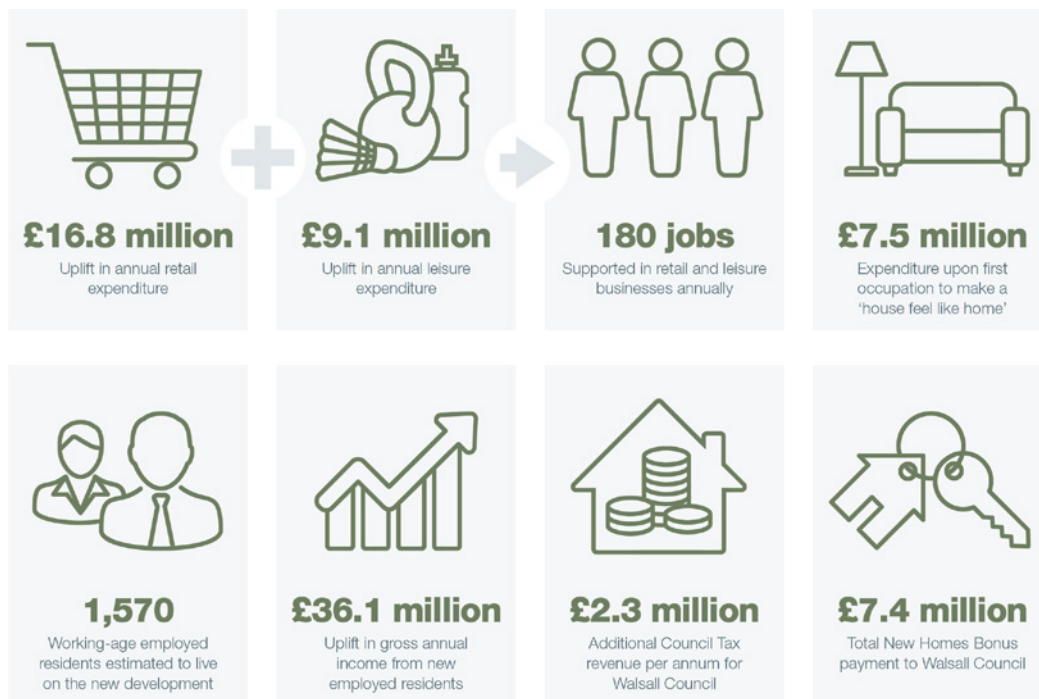


The economic benefits of development at Columba Park include:

### Construction Phase



### Operational Phase



*The document has illustrated an indicative spatial framework which could form the foundation for future development proposals at Columba Park. This has been built up in response to appreciation of the unique context, demonstrating a highly credible and deliverable opportunity. This is intended to be the starting point to a process of refinement and detailing, based on further assessment of potential constraints and technical feasibility work.*

*We are willing and fully intend to engage further in the BCCS review, and with Walsall Council, residents and other key stakeholders to discuss the merits of this exciting opportunity.*





Prepared for IM Land  
by Brownhill Hayward Brown Ltd,  
trading as BHB Architects,

in conjunction with Turleys, SLR Consulting, TEP, M-EC and EDP.

bhb architects

**Turley Office**  
9 Colmore Row  
Birmingham  
B3 2BJ

T 0121 233 0902

**Turley**